



M O S K O W I T Z & B O O K , L L P

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March 19, 2014

Honorable Cheryl L. Pollak
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: Ambrose v. The Mount Sinai Hospital and Shepherd
CV-11-2026 (KAM)(CLP)

Dear Judge Pollak:

This firm was recently retained to represent defendant Maxine Shepherd in the above-referenced matter. We have been informed that the Court set a schedule for the parties to complete certain depositions by March 31, 2014 and April 2, 2014 as a date for a status conference. I do need some time to get up to speed on this case and to prepare to participate in the plaintiff's deposition, as well as to prepare my client for testimony. I am also not available for ten days in mid-April, as I will be away for the Passover holiday. I therefore respectfully request your indulgence in adjourning the current schedule as follows: deadline to complete the depositions be extended to May 9, 2014 and adjourn the status conference to the week of May 12, 2014.

I have conferred with counsel for plaintiff and counsel for defendant The Mount Sinai Hospital and they have no objection to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Chaim B. Book
Attorney for Defendant Maxine Shepherd

cc: Ian Wallace, Esq. (via ECF)
Julie Weber, Esq. (via ECF)